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February 15, 2023

**VIA ECF**

Honorable Pamela K. Chen  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *IME Watchdog, Inc., v. Safa Abdulrahim Gelardi, Vito Gelardi, Gregory Elefterakis, Roman Pollak, Anthony Bridda, Nicholas Elefterakis, Nicholas Elefterakis, and IME Companions LLC*, Docket No.: 1:22-cv-1032**

Dear Judge Chen:

This law firm is counsel to the Defendants, Gregory Elfterakis (“Elefterakis”), Roman Pollak (“Pollak”), and Anthony Bridda (“Bridda”) (collectively “Defendants”), in the above-referenced matter. We write pursuant to Your Honor’s Individual Practices.

First, pursuant to the attached Stipulation, Defendants are withdrawing, without prejudice, their request for a pre-motion conference (see Docket Entry [135](#)) in anticipation of Defendants filing a motion to dismiss Plaintiff IME WatchDog Inc.’s (“Plaintiff”) First Amended Complaint (the “Amended Complaint”).

Second, Defendants are requesting a second extension of time to answer and/or otherwise respond to Plaintiff’s Amended Complaint until April 3, 2023 to allow time for the Defendants to engage in discussions aimed at resolutions with Plaintiff. Plaintiff has consented to same via the attached Stipulation. Pursuant to your Honor’s Individual Practices and Rules, please be advised that: (a) Defendants’ time to answer was originally scheduled for February 2, 2023 (see Docket Entry [129](#)); (b) Defendants herein have made one prior request on February 1, 2023 for an extension of time to answer and/or otherwise respond to Plaintiff’s Amended Complaint to March 3, 2023 (see Docket Entry [133](#)) and the Court granted same on February 2, 2023; (c) Plaintiff consented to the requested adjournment to April 3, 2023 via the attached Stipulation; and (d) no other deadlines are affected by this request for an extension.

We thank the Court for its courtesies.

Respectfully submitted,

**ABRAMS FENSTERMAN, LLP**

/s/ Melanie I. Wiener

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*Attorneys for Defendants Gregory Elfterakis,  
Roman Pollak and Anthony Bridda*

CC: All counsel of record via ECF

- and -

**VIA ECF**

United States District Court

Eastern District of New York

Attn: Hon. James R. Cho, U.S.M.J.

225 Cadman Plaza East

Courtroom 11D South

Brooklyn, NY 11201-1804

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
IME WATCHDOG, INC.,

Case No.: 1:22-cv-1032 (PKC) (JRC)

Plaintiff,

**STIPULATION**

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,  
NICHOLAS LIAKIS, and IME COMPANIONS LLC

Defendants.

-----X  
SAFA GELARDI and IME COMPANIONS, LLC

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendants.

-----X  
CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
And IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

-----X

IT IS HEREBY AGREED by and between the attorneys for the undersigned parties that Defendants GREGORY ELEFTERAKIS, ROMAN POLLAK, and ANTHONY BRIDDA hereby withdraw the Pre-Motion Conference Request Letter dated February 9, 2023 (Docket No. 135) without prejudice;

IT IS ALSO HEREBY AGREED by and between the attorneys for the undersigned parties that Defendants GREGORY ELEFTERAKIS, ROMAN POLLAK, and ANTHONY BRIDDA's time to answer and/or otherwise respond to plaintiff's first amended complaint is extended until April 3, 2023; and

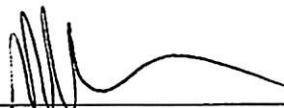
IT IS ALSO HEREBY AGREED by and between the attorneys for the undersigned parties that Defendants GREGORY ELEFTERAKIS, ROMAN POLLAK, and ANTHONY BRIDDA hereby waive all personal jurisdictional defenses related to the service of process and accept service of the first amended complaint.

Dated: February 15, 2023

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